

## Issue Brief

## CYBER SERIES

By Margaret Lin

*An Update of "Authorizing Virtual Charter Schools: Rules of the Road on the Digital Highway" by Gregg Vanourek*

## School Quality in the Cloud: Guidelines for Authorizing Virtual Charter Schools

One of the most interesting yet challenging developments in recent years for many charter authorizers across the country has been the rapid rise and expansion of virtual or online charter schools. These schools offer K-12 courses through the Internet, with time and/or distance separating the teacher and learner.<sup>1</sup> From state to state, such schools may also be called “cyber” or “distance learning” schools. (All briefs in NACSA’s Cyber Series will use the terms “virtual” and “online” schools interchangeably.) These terms all describe similar types of online learning environments and instructional delivery systems, with students taking all their courses from home or any place outside of a school building, without a fixed schedule.

Virtual charter schools are an important and fast-growing segment of the charter school sector. In the 2009-10 school year, there were 219 virtual charter schools across the nation, or about 4.5 percent of all charter schools, serving 168,310 students.<sup>ii</sup> Online education, which can extend a single school’s reach

to potentially thousands of students across a given district or state, vastly multiplies a school’s capacity to provide educational opportunities to students in need of options, wherever they may live.

At the same time, this form of instructional delivery presents new challenges for authorizers, requiring thoughtful adaptation of traditional charter application review, oversight, and evaluation methods to unique features of online schooling. Because of the potential scale involved, authorizing a single high-quality virtual school can provide valuable opportunities to thousands of students – while a single low-quality virtual school can harm thousands. However, authorizing practices have not kept pace with the rapid growth of online charter schools. Most states and individual authorizers are still in the early stages of developing authorizing policies and procedures that are adapted to the special circumstances of virtual learning environments, and only a few authorizers have designed or tailored

### About This Issue Brief

This Issue Brief is part of NACSA’s Cyber Series, which addresses issues in policy and practice that concern authorizing online schools and blended learning. This brief aims to improve authorizer understanding and oversight of online charter schools generally, with particular focus on strengthening authorizer practices in evaluating proposals for virtual charter schools.

For more detail on the field of online education in general and the breadth of issues and technology applications underway now, see the previous Issue Brief in this series, “An Updated Primer on Virtual Charter Schools: Mapping the Electronic Frontier.” For information on working with blended-learning schools, see NACSA Policy Guide, “Online and Blended Learning.”



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authorizing procedures specifically for online schools.<sup>iii</sup> Authorizers need guidelines that are tailored to the challenges and opportunities of twenty-first-century schoolhouses built in the cloud.

While significant state policy improvements are needed to adapt to the world of online schooling, there are many sound practices that authorizers can adopt without state policy changes. (For discussion of recommended changes in state policy, see NACSA Policy Guide, “Online and Blended Learning.”) To help authorizers navigate the virtual-schooling frontier, this Issue Brief presents recommended practices for quality authorizing of online charter schools that are aligned with NACSA’s *Principles & Standards for Quality Charter School Authorizing*. It begins by discussing a number of key issues for authorizer awareness and consideration in the virtual charter context, with attention to both initial approval and ongoing oversight. The brief then provides more specific guidance to authorizers in **evaluating proposals for online charter schools** – including identifying key application questions and review practices to evaluate virtual charter applicants’ plans and capacities. Lastly, the brief concludes with general recommendations for overseeing and evaluating online charter schools.

## Charter School Oversight in the Virtual Context

A major problem for many authorizers in evaluating virtual charter schools is lack of understanding of how online charter schools operate. Such uncertainty often leads to ill-targeted or ineffective oversight. Virtual-charter authorizing is marked by opposing tendencies: either to over-regulate, reverting to bureaucratic protocols and imposing non-essential requirements that distract the schools from educating students; or to let troubles fester and problematic schools continue indefinitely.

Though there should be some differences in authorizer oversight of online charters, these do not require radical reinventions of existing authorizing protocols. Another brief in this Cyber Series outlines the many ways in which online charter schools closely resemble brick-and-mortar schools.<sup>iv</sup> Indeed, the way to think about a virtual charter school is simply to think of a “regular” charter school and remove the building: swap in a computer instead and the Internet connection becomes the “bus” transporting students to school.

Online charter schools are accountable for student, financial and legal/contract performance in all the same

areas as their brick-and-mortar counterparts. As such, online charter schools must meet a host of requirements, such as reporting attendance and other student data; providing free and appropriate special education and related services; administering state standardized tests in a proctored setting; undergoing financial audits; and complying with applicable local, state, and federal laws and regulations (including health, safety, and civil rights codes). Likewise, an authorizer must collect and analyze a host of data about the school’s performance such as state standardized test results, attendance, graduation and dropout data, financial audit findings, and special education program reviews.<sup>v</sup>

A significant difference in overseeing virtual schools, of course, is the distance between key stakeholders (teachers and students, administrators and governing board, etc.). For example, site visits or “spot checks” are less telling in the virtual-school environment, because the students and teachers are not in the same building at the same time. Still, periodic site visits are worth conducting because they can provide insights into how well online charter schools are managed and the capabilities of the administrative and teaching team.

In the end, though, site visits and face-to-face meetings constitute a relatively small part of oversight for most charter schools, whether virtual or not. An authorizer’s monitoring task relies largely on regular review and analysis of school data and ongoing communication with school leaders through a variety of means. The “distributed” nature of online schools ought not inhibit the ability of authorizers to conduct effective oversight. However, authorizers must take into consideration the unique operational circumstances of online charter schools when developing and implementing systems and practices to oversee them effectively. Following are several areas warranting particular attention and sometimes adaptation of authorizer practices.

## Issues Unique to Online Charter Schools

### Targeted Student Population

Many online charter schools tend to attract a different population from traditional brick-and-mortar schools – often students with unique, diverse educational and developmental needs. Full-time online schooling is a good fit and valuable opportunity for some students. However, it is not a good fit for every student. It requires high capacity for and commitment to independent, self-

regulated learning without the daily face-to-face guidance and support of teachers or the social engagement that traditional schools offer. Likewise, it typically requires a particularly high degree of home support and parental involvement for student success. For students not suited to this type of self-regulated environment, traditional schools or blended models that combine online learning and face-to-face instruction may offer a better fit. (See NACSA Policy Guide, “Online and Blended Learning.”)

Authorizers should carefully consider whether the students targeted by a proposed virtual school are likely to be the ones who actually enroll, and whether these students are likely to succeed and thrive in online schooling. In addition, authorizers should examine rigorous evidence of the program’s academic success with similar students.

### Large Scale

Without the limits of a traditional school building, classrooms, and daily schedule, online charter schools often have dramatically larger class sizes and student-teacher ratios than traditional schools. The sheer capacity to scale and reach potentially thousands of students is integral to the purported benefits of many online schooling models, and is indeed valuable when the program is high-quality and well-suited to the students it serves. However, the flip side is equally true: large scale lies at the core of cost savings that provide both incentive and opportunity for low-quality operators to *disserve* thousands of students. It is the responsibility of authorizers to carry out due diligence and careful scrutiny to discern the difference.

### School Operations

Virtual schools may struggle with logistics unique to online schooling. These issues may range from sending out and keeping track of computers used for instruction (generally they are school property loaned to students and must be reclaimed when a student transfers or graduates) to proctoring state assessments for students at many testing sites across a state. Authorizers should anticipate these operational issues by flagging them during the application process and weaving them into their monitoring work, all the while looking for school teams that can effectively manage such contingencies.

### Enrollment and Attendance

Existing statutes, regulations, and policies designed for traditional schools sometimes do not fit the world of

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online schooling: think square pegs in round holes. For example, a single “count day” approach to calculating attendance – which drives funding – makes little sense for virtual schools, where students complete coursework from home or elsewhere at any hour of the day, any day of the week. Some virtual schools have unusually high student mobility (discussed below), making the “count day” approach even more problematic. Indeed, a threshold question for any virtual school is how it defines attendance in the first place – by hours logged in, lessons completed/mastered, or other ways? Student computers may be logged-in while students are not, or students may spend most of their time working independently on materials offline. Defining attendance in a virtual environment is not always a straightforward proposition, and online schooling creates opportunities for innovation in restructuring the relationship between time and learning.

### Student Mobility – Collecting and Understanding the Data

Many online schools attract significant proportions of students who enroll for relatively short periods due to personal circumstances and needs, rather than enrolling continuously for a year or multiple years. These schools will exhibit high mobility and “churn” rates, even while they may be fulfilling their mission. Turnover is to be expected for those students who enroll in online education as a temporary transitional solution – for example, during extended illness or injury, or for credit recovery or supplemental coursework. The school “succeeds” when these students move on to – and succeed in – a new setting. A school’s mission is critical here.

For other students, however, high turnover indicates that the school is not meeting student needs. A high churn rate also can distort state assessment results, as many students may not attend long enough to take the state

assessment. Or they may take it only for one year, thus not providing data on those students' year-to-year growth while attending the school. Similarly, state systems may not attribute many students' scores to a school if they have recently enrolled. Authorizers must be able to distinguish between schools that have high mobility by design (where students transitioning out of the school to desired new settings is a measure of success) and those where high turnover signals failure to meet students' needs.

High student mobility is no excuse for having little data on student progress or outcomes. For schools that have high mobility, authorizers should require:

- Different types of valid, reliable data that are meaningful for the particular school design, mission, and population.
- Rigorous growth-focused performance measures and data that reveal the school's impact on students it serves for any length of time.
- More frequent academic reporting, including internal assessment data. This is reasonable for online schools because they collect data electronically in real time.

In addition, for schools that are designed to serve as temporary supports and thus expect to have high mobility by design, authorizers should require:

- (*In the charter application*) Identification of the types of future students the school expects to transition out quickly, and why.
- (*During oversight*) Reporting data on the risk factors or personal circumstances that students bring with them, to confirm the causes of student mobility.
- (*During oversight*) Reporting data on students' outcomes, transition, or educational/career placement after leaving the virtual school.

## Other Authorizing Challenges Common in the Virtual Charter Context

In addition to the above matters, a few other issues – while not unique to the online context – present common challenges to authorizers in approving, overseeing, or evaluating virtual charters.

### Contracts with School Management Organizations

Most virtual charter schools – particularly those serving the greatest numbers of students – are operated under third-party contracts with management organizations or

service providers. Just as in the brick-and-mortar world, these contractual relationships present governance and accountability problems when not properly structured or executed – such as when the school governing board lacks the will, capacity, or independence to oversee the contractor's performance and services effectively. Authorizers should scrutinize such governance relationships and board capacity when initially reviewing charter proposals that rely on contracted external management.

NACSA's *Principles & Standards for Quality Charter School Authorizing* offers particular guidance to authorizers in evaluating proposals that rely on a third-party provider, as well as in requiring certain assurances through the charter contract itself. In addition, NACSA's *Principles & Standards* state that authorizers should review and approve such third-party contracts as a condition of charter approval.<sup>vi</sup>

Among other matters, authorizers should ensure that when schools are contracting for external services, the school governing board has the practical ability to terminate those services if the board is not satisfied. This means that even if a school's charter agreement states that the school will use "X Company's" management and curriculum, the school's board has the right to petition the authorizer for a material change to its charter agreement if it desires to change any of its contracted services or providers. (This basic principle applies equally to brick-and-mortar and online charter schools that operate under third-party contracts. However, some complications have arisen in the virtual-charter context, where schools sometimes have separate management and curriculum contracts with the same provider, yet feel locked into one because it is part of their charter agreement, when they would rather terminate both.)

### Performance Record of School Replicators

Many online charter schools are operated or proposed by organizations that have experience operating other online schools. Often these organizations are already serving thousands of students elsewhere. These organizations are commonly called school "replicators" because they replicate an existing program and school design. Where a virtual charter school is proposed by a replicator, it is incumbent on authorizers to examine many elements, including: a) the academic, financial and operational performance record of the replicator's portfolio of schools; and b) the growth plans and capacities of the organization,

to be assured that the operator can support and maintain quality in the proposed school over the long term while also attending to the demands of a larger and perhaps ever-growing network. The effort to evaluate replicators is one of the tasks that can be complicated by the lack of valid metrics discussed above.

### Potential Authorizer Conflicts of Interest

The potential for conflicts of interest exists when authorizers are funded in whole or part by the schools they charter, typically based on student counts. These oversight or administrative fees are often determined by statute and tend to range from 0.5 to 5 percent of total per-pupil revenues. The problem is that this funding source (especially if it is the sole funding source) might cloud or compromise an authorizer's judgment in charter approval and accountability decision-making.

Of course, this potential conflict is not unique to online charter schools, but the capacity of online schools to scale to thousands of students raises the financial stakes for their authorizers. For example, an authorizer may become financially dependent on a virtual school that serves 5,000 students, and thus less likely to close it regardless of its educational outcomes. Moreover, oversight costs are unlikely to increase in direct proportion to enrollment, so the oversight fees an authorizer receives from a single virtual school enrolling thousands would become a source of surplus revenue for the authorizer. NACSA's *Principles & Standards for Quality Charter School Authorizing* recommends that authorizers funded by such school fees implement protections to ensure that the potential for revenue gain or loss does not influence charter approval, renewal, or revocation decisions. An authorizer's use of oversight fees should be restricted to fulfillment of its authorizing responsibility so that the authorizing function is revenue-neutral.<sup>vi</sup>

### Good Authorizing is Good Authorizing – with Some Tweaks

What do these issues tell us about how best to authorize and oversee virtual charter schools? A key principle is that **good authorizing is good authorizing—whether for online or brick-and-mortar schools**. The basic structures and practices of sound authorizing shouldn't change simply because of a high-tech delivery system or because the schools have no walls. Essentially, authorizing virtual schools should be modeled closely after effective charter authorizing for traditional schools unless there

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are compelling reasons to make changes. The "burden of proof" is on those considering changes. Furthermore, changes to those basic structures should be made only after careful consideration of the precedents they may set for future schools of various shapes, sizes, and flavors.

But that doesn't mean that authorizing virtual charter schools is identical to authorizing brick-and-mortar schools. Indeed, there are several areas where new thinking and approaches are warranted, requiring authorizers to view virtual schools through different lenses or to pay special attention. These areas include:

- **Educational Technology Expertise:** Competently evaluating an online charter school requires expertise in educational technology and online schooling, yet most authorizers lack such expertise on their own staff. Where internal expertise is lacking, it is essential for authorizers to **include external experts in online schooling** (who may be practitioners, consultants, academics, or researchers) on their review and interview panels when evaluating proposals for virtual charter schools. Such experts are needed to critically scrutinize a school's proposed instructional design or system architecture and ask well-informed questions; bring knowledge of emerging best practices as well as poor practices in online education; and generally demystify this new form of instruction. Similarly, where a school would be operated by an external management organization, it is essential to confirm that a school governing board possesses sufficient technological expertise to oversee the operations of the service provider.

- **Data Management Systems and Academic Reporting:** Through smart uses of technology, online schools can make strides in the effective use of formative and summative assessments and educational data. Ideally, there will be a data bridge between the online charter school and its authorizer, so that the latter has access to important information about academics, operations, and finances. Thus, authorizers should pay special attention to the school's use of such

systems to track basic accountability elements and to provide teachers, administrators, parents and students with instant access to critical information about student learning.

As noted earlier, given that virtual schools' academic data are completely electronic and maintained in real time, it is reasonable for authorizers to require more frequent academic reports from virtual schools. Likewise, given that many online schools serve students who need to catch up, are highly mobile, or are at-risk in various ways, authorizers would be well-advised to require frequent reporting of student progress and academic growth according to valid, reliable measures. This may include requiring reporting of internal data that measure student performance against state standards.

- **Distributed Logistics:** Though their lessons take place in the cloud, virtual schools still require operational and logistical competence to move people and things from one place to another (e.g., shipping computers to students; setting up official, appropriately proctored testing sites statewide for convenient student/family access; training teachers at regional venues). Authorizers should not overlook the important “blocking and tackling” work that goes on behind the scenes to arrange for special education services or state testing or to send instructional materials and computer hardware to students, track them, reclaim them, and otherwise keep the program running smoothly.
- **Distributed Organization:** Online schools, too, are dependent on quality people to provide a quality education, and they present the unique challenge of building coherence and a sense of school community when teachers and administrators are perhaps rarely working face to face. School staff must be well-prepared for the challenges of working in a virtual environment. Authorizers should closely examine specific plans and capacities demonstrating that the founding group will operate a cohesive, well-functioning, mission-driven school – and is not just a disparate group of individuals engaged in solo educational endeavors.
- **Larger Scale:** Given their flexibility with time and space, many online charters are able to “scale up”

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to the size of universities, serving several thousand students instead of several hundred. There is no doubt that technology helps to facilitate such scale and reach, but authorizers should require evidence that schools and providers can manage growth adequately without sacrificing student learning.

- **Special Education Services:** Like all public schools, online charter schools must comply with federal and state special education law (see box below). Special education and related services provide students with disabilities access to the curriculum with individualized supports that enable them to succeed. Online school operators must craft a comprehensive process as well as viable systems to identify and provide services to their students with disabilities. Appropriate special education programs must be in place before schools open. Even before the first special education student enrolls, every virtual school will need to have established a process to work with the individualized education program (IEP) team to modify any prospective student's IEP as needed to reflect the new learning environment.

Online schools should anticipate the need to integrate accommodations and modifications into their program and ensure that all instructional personnel, not just special educators, are prepared to differentiate their instruction for students with disabilities. With no physical building where students can convene for pull-out services, authorizers should look closely at the school staff's expertise and abilities to forge workable contractual relationships with qualified providers.

To fulfill their obligations, online schools must demonstrate that their staff, systems, and services are capable of recreating the processes and services that a student would access in traditional schools.

This requirement to do everything that brick-and-mortar schools could do for special education – and to do it in very similar ways – contrasts from the flexibility granted to online schools in most other areas. Special education laws and requirements tend to be more process-oriented than other elements of federal and state law.

In addition, the demands of independent, home-based learning require school operators to have an ongoing

dialogue with parents about what students and their families must do to succeed in a virtual school. If not handled carefully, the complexity of providing special education in a virtual environment may discourage enrollment of students with disabilities. Authorizers should scrutinize the operator's outreach and recruitment tools, materials, practices, and enrollment data to ensure that all students, including those with disabilities, have equal access to the school.

### **Virtual Charter Schools and Special Education**

As public schools, virtual charter schools are required to abide by all federal special education statutes, including the Individuals with Disabilities Education Act (IDEA), Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act (ADA) and the Fourteenth Amendment of the U.S. Constitution. A virtual charter school's specific responsibilities for meeting special education requirements depends on its legal status—specifically, whether it falls under the jurisdiction of the local or regional school district or is considered its own local education agency (LEA) by the state. Most virtual charter schools, like many conventional charter schools, function as independent LEAs under state law. Consequently, they are responsible for abiding by all special education rules and regulations, including conducting special education student identification and evaluation; developing IEPs; and providing individualized support, curricular modifications and adaptations as well as related services such as occupational, physical and speech therapy. Virtual charter schools that operate as part of an LEA typically work closely with their LEA to provide special education services.

Virtual charter schools that offer highly individualized programs may be an excellent fit for students with disabilities, but it can be challenging to meet state and federal special education requirements in an online environment. Virtual school administrators must familiarize themselves with federal and state requirements to ensure that they understand the services to which students with disabilities are entitled. Related services, particularly occupational and physical therapy, may be especially difficult logically to provide over a wide geographic area.

<sup>i</sup> The information in this box is from Lauren Morando Rhim and Julie Kowal, *Demystifying Special Education in Virtual Charter Schools*, National Association of State Directors of Special Education, 2008, pp. 9-10, <http://www.nasdse.org/Portals/0/Web%20copy%20of%20Rhim%20report%20Jan%202008.pdf>.

## General Recommendations for Evaluating Virtual Charter School Proposals

In evaluating proposals for virtual charter schools, authorizers should follow NACSA's standards for reviewing charter applications generally, as set forth in NACSA's *Principles & Standards for Quality Charter School Authorizing*, including the following standards:

**NACSA Standard: [A quality authorizer]**  
*Rigorously evaluates each application through thorough review of the written proposal, a substantive in-person interview with the applicant group, and other due diligence to examine the applicant's experience and capacity, conducted by knowledgeable and competent evaluators.*

**NACSA Standard: [A quality authorizer]**  
*Engages, for both written application reviews and applicant interviews, highly competent teams of internal and external evaluators with relevant educational, organizational (governance and management), financial, and legal expertise, as well as thorough understanding of the essential principles of charter school autonomy and accountability.*

Thus, authorizers should plan to conduct a meaningful interview with each applicant group to verify or obtain further information and assess the group's capacity to implement the plans presented in the written proposal. As stated earlier, authorizers should ensure that their application review and interview team includes appropriate **internal and external expertise in educational technology and online learning**, and expertise needed to evaluate virtual school operators' plans and capacities.

In addition, in evaluating virtual charter applications, authorizers should carefully examine and assess:

- *A thorough demonstration of the online lessons and how they are reinforced* by direct teacher interaction. Without a demo, it is difficult to "get" – and assess the quality and effectiveness of – these programs.
- *How the program works* – and the performance record it has achieved with students similar to the targeted population.

- *The essential program elements*, which the application should soundly articulate. At the same time, in the spirit of good chartering, authorizers should allow for flexibility in program delivery, while clearly stating accountability expectations and focusing rigorously on results.

- *The school's proposed or actual relationship with any education service provider* (if applicable). The authorizer must be assured that the governing board possesses the capacity and commitment to exercise independent oversight of the provider and to be ultimately accountable for the school's performance.
- *The governing board's awareness of online learning resources* available in the marketplace and the rationale for their educational selections – especially given that the landscape changes frequently. The authorizer should be confident that the school's governing board has a solid understanding of what is offered in the marketplace (or how home-grown programs can fill existing niches or gaps), and expect board members to demonstrate that they understand and affirmatively support the key structural elements and choices made by the education provider, if applicable.
- *The school leadership*: Will the school be led by an administrator experienced in running traditional schools, or a technology guru? The applicants should demonstrate a sound rationale and rigorous selection for this critical decision, as well as the likelihood of success for their choice.
- *Student-level data management and accountability systems*: The proposed operator should demonstrate that it has well-developed, reliable processes and systems for collecting critical performance information.
- *Special education programs, staffing and systems*: The applicants should demonstrate solid understanding, capacity and commitment to fulfill their obligations under IDEA and related laws.
- *Policies and procedures for enrollment, attendance, withdrawal and mid-year transfers* – common sources of hiccups in online charters.
- *The school's plan for ensuring that all students are properly supervised* by a parent or responsible adult.
  - Require large programs or operators to present multi-year, disaggregated data from state, authorizer, or independent third-party evaluations that assess the academic success of the operator's existing virtual schools.

### Probe the Performance Record of School Replicators

If a school is proposing to replicate an existing program, the authorizer will need to examine whether the model has proven to be successful in increasing student achievement and maintaining a viable organization. This is an area in which the availability and applicability of traditional metrics of school performance can be complicated. This means the authorizer should:

- Fully examine and probe the appropriateness and validity of metrics used to demonstrate performance.
- Investigate the effectiveness of that model in other schools, particularly those serving students similar to the anticipated population for the proposed school.
- Require the operator to provide demographic and disaggregated, student-level academic achievement and growth data for all of its schools serving students similar to the expected population.
- Examine the proportion of students participating in state testing in the provider's existing online schools, as high student mobility may result in the test participation of only a small proportion of students. If this is the case, require and examine valid, reliable data for other measures of student achievement and outcomes in addition to the state testing data.

### NACSA Principles & Standards for Quality Authorizing

#### Elements for Applicants Proposing Virtual or Online Charter Schools

Applicants proposing to establish a virtual or online charter school should be required to describe the proposed school's system of course credits and how the school will:

- Monitor and verify full-time student enrollment, student participation in a full course load, credit accrual, and course completion.
- Monitor and verify student progress and performance in each course through regular, proctored assessments and submission of coursework.
- Provide appropriate services in the virtual learning environment to students with disabilities and English learners.
- Conduct parent-teacher conferences, Administer state-required assessments to all students in a proctored setting.

#### Application Elements for Existing School Operators or Replicators

Applicants who are existing school operators or replicators should be required to:

- Provide clear evidence of their capacity to operate new schools successfully while maintaining quality in existing schools.
- Document their educational, organizational, and financial performance record based on all existing schools.
- Explain any never-opened, terminated, or non-renewed schools (including terminated or non-renewed third-party contracts to operate schools).
- Present their growth plan, business plan, and most recent financial audits.
- Meet high standards of academic, organizational, and financial success to earn approval for replication.

## Recommendations for Overseeing and Evaluating Online Charter Schools

A few summary recommendations for authorizers in overseeing and evaluating virtual charters include:

- Require that approved virtual charter schools provide full disclosure in advance to interested families regarding the terms and requirements of the program and the instructional materials provided, while ensuring that their enrollment practices do not discriminate against particular populations or students.
- Consider online, automated data management to reduce paperwork burdens. Indeed, part of the promise of online schooling is not only in the delivery of engaging instructional programs but also in data management generally – the delivery of data on multiple aspects of the program to various constituencies with rightful access to such information. Online schooling is an opportunity for education professionals, including authorizers, to address this often-elusive piece of the educational technology puzzle.

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- Monitor special education programs to ensure compliance with IDEA and related laws and regulations.
- Monitor internal controls to ensure assets of the school are properly safeguarded, particularly given the “distributed” nature of many assets.
- Ensure timely and accurate reporting of student data (enrollment, attendance, transfers, graduation, etc.).
- Be prepared to monitor and evaluate the success of schools that have high student turnover, which may indicate that the school is fulfilling its mission – or entirely the opposite.

## Conclusion

The bottom line is that the elements of good authorizing remain consistent whether in an online environment or a little red schoolhouse. Just as the “laws” of quality education still hold in online schooling, so do the laws of quality authorizing. The use of Internet technologies and electronic delivery mechanisms does not warrant a wholesale reinvention of the authorizing function. However, it is likely to present distinctive issues and challenges in important areas such as: oversight expertise, attendance tracking and reporting, student mobility, data management systems, academic reporting, distributed logistics and organization, special education, and ensuring quality at scale. In addition, where virtual charter applicants are proposing to contract with management organizations – or are existing school operators with a performance record – authorizers should conduct due diligence designed specifically to evaluate the performance and capacities of those types of operators, as well as governing board capacities for effective oversight of external management contracts.

Authorizers have the unique opportunity and responsibility to ensure quality while enabling innovation in this fast-growing branch of the charter sector – a branch that will play an increasingly significant role in the future of public education across the country. The essential principles, standards, practices, and tools already exist to equip authorizers to meet this challenge. By augmenting or modifying fundamental “rules of the road” for quality authorizing – while acquiring necessary expertise in online schooling – authorizers will play a leading role in ensuring that students are well-served on the new educational frontier.

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## ENDNOTES

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- i For a general introduction to virtual or online charter schooling, see Gregg Vanourek and Evergreen Education Group, "An (Updated) Primer on Virtual Charter Schools: Mapping the Electronic Frontier," NACSA Issue Brief, September 2011, [http://www.qualitycharters.org/images/stories/publications/Issue\\_Briefs/NACSA\\_Cyber\\_Series\\_EvergreenIssueBrief.pdf](http://www.qualitycharters.org/images/stories/publications/Issue_Briefs/NACSA_Cyber_Series_EvergreenIssueBrief.pdf).
- ii The Public Charter Schools Dashboard, National Alliance for Public Charter Schools, <http://dashboard.publiccharters.org/dashboard/schools/page/virtual/year/2010>.
- iii John Watson and Chris Rapp, "Quality Authorizing for Online and Blended-Learning Charter Schools," NACSA Monograph, April 2011, <http://www.qualitycharters.org/publications-resources/other-nacsa-publications>, pp. 1, 4.
- iv See Vanourek & Evergreen Education Group.
- v For NACSA's recommendations on essential elements to include in a performance evaluation framework for charter schools generally, see "Performance Framework Elements," NACSA Principles & Standards for Quality Charter School Authorizing, p. 21, <http://www.qualitycharters.org/publications-resources/principles-standards>.
- vi See NACSA *Principles & Standards for Quality Charter School Authorizing*, "Elements for Applicants Proposing to Contract with Education Service or Management Providers," p. 20, and "Education Service or Management Contracts," pp. 22-23.
- vii NACSA *Principles & Standards for Quality Charter School Authorizing*, pp. 11, 24.
- viii The information in this box is from Lauren Morando Rhim and Julie Kowal, *Demystifying Special Education in Virtual Charter Schools*, National Association of State Directors of Special Education, 2008, pp. 9-10, <http://www.nasdse.org/Portals/0/Web%20copy%20of%20Rhim%20report%20Jan%202008.pdf>.
- ix For more detailed guidance on evaluating existing school operators or replicators, see NACSA Replication Brief No. 1, "NACSA Charter School Replication Guide: The Spectrum of Replication Options" (August 2010), available at [www.qualitycharters.org/publications-resources/issue-briefs](http://www.qualitycharters.org/publications-resources/issue-briefs).

NACSA develops quality authorizing environments that lead to a greater number of quality charter schools. Learn more about NACSA at [www.qualitycharters.org](http://www.qualitycharters.org).

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